

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STEPHANIE HASHEM,
Plaintiff,
v.
ARMY & AIR FORCE EXCHANGE SERVICE,
Defendant.

UNOPPOSED MOTION FOR EXTENSION OF TIME
(Second Request)

Federal Defendant Army and Air Force Exchange Service (“Federal Defendant” or “AAFES”) respectfully requests an extension of time to respond to Plaintiff’s Motion for Summary Judgment (ECF #39) until October 8, 2015. A response is currently due on August 25, 2015.

In support of the instant Motion, the Federal Defendant submits the following:

1. This Motion is brought in order to accommodate the parties.

2. Federal Defendant deposed Plaintiff on Wednesday, August 19, 2015. During the deposition, Plaintiff indicated she had several documents that were responsive to Federal Defendant's subpoena *duces tecum* that she did not have with her to produce at the time of her deposition. Plaintiff stated the additional documents are relevant to the primary issues in this case. Plaintiff agreed to produce the additional documents within thirty (30) days.

3. The requested extension of time is necessary in order for Federal Defendant to receive and review the additional responsive documents prior to completing its Opposition to Plaintiff's pending Motion for Summary Judgment.

4. The instant motion is filed in good faith and not for the purposes of delay.


WHEREFORE, for the above reasons, Federal Defendant respectfully requests the instant Motion extending time to respond to Plaintiff's Motion for Summary Judgment until on or before October 8, 2015, be granted.

Respectfully submitted this 25th day of August 2015.

DANIEL G. BOGDEN
United States Attorney

/s/ Justin E. Pingel
JUSTIN E. PINGEL
Assistant United States Attorney

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE
Dated: August 26, 2015.